

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ZEO HEALTH LTD., MICAH PORTNEY,
TOUCHSTONE LIFE ESSENTIALS, INC.,
and NORWOOD E. STONE,

Plaintiffs,

-against-

ZOI GLOBAL, LLC, LORI R. LEE, DENISE
STEPHENS, METRON
NUTRACEUTICALS, LLC, and,
NIKOLAOS TSIRIKOS-KARAPANOS,

Defendants.

Case No. 2:21-cv-11410 (ES)(MF)

**DECLARATION OF PAUL S. DANNER IN SUPPORT OF LORI R. LEE'S
MOTION TO DISMISS PURSUANT TO FED. R. CIV. P. 12(b)(6)**

I, PAUL S. DANNER, declare as follows:

1. I am an attorney in the State of New Jersey, a member in good standing of the Bar of this Court, and a Partner in the law firm of Goldberg Segalla, LLP, attorneys for Defendant Lori R. Lee ("Lee"). I have personal knowledge of the facts recited herein and respectfully submit this Declaration in Support of Ms. Lee's Motion to Dismiss pursuant to Fed. R. Civ. P. 12(b)(6).

2. Attached as Exhibit A is a true and correct copy of Plaintiffs' Complaint.

3. Attached as Exhibit B is a true and correct copy of "screenshots" of Defendant ZOI Global, LLC's ("ZOI") website prior to having followed a link from

Ms. Lee's website and prior to having selected Ms. Lee as the relevant consultant on the ZOI website, and which do not reflect Ms. Lee's presence:

- a. ZOI home page: www.zoiglobal.com;
- b. ZOI products page: www.woiglobal.com/products;
- c. ZOI Consultant Contact page: www.zoiglobal.com/consultant-contact.

4. Attached as Exhibit C is a true and correct copy of the following screenshots:

- a. ZOI webpage depicting the link from Ms. Lee's Wellness Center website to ZIO's website: www.thewellnesscenternwj.com/contact-us.html;
- b. ZOI webpage that one is directed to after following the link from Ms. Lee's Wellness Center website: www.zoiglobal.com/WELL4LIFE/rwww.zoiglobal.com/WELL4LIFE?r=C1167;
- c. ZOI webpage for Ms. Lee's contact information after one has selected Ms. Lee as the relevant consultant: www.zoiglobal.com/consultant-contact/?u=well4life; and,
- d. ZOI home webpage after Ms. Lee has been selected as the consultant: www.zoiglobal.com/well4life.

6. I declare under penalty of perjury that the foregoing is true and correct.

By: /s/ Paul S. Danner
Paul S. Danner

CERTIFICATE OF SERVICE

I hereby certify that I caused Ms. Lee's Notice of Motion, Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(b)(6), Declaration of Paul S. Danner with the exhibits attached thereto, and a Proposed Order to be filed through the ECF system and notice will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).



Paul S. Danner